



PO Box 200701  
Helena MT 59620-0701  
(406) 444-3186  
FAX: (406) 444-4952  
Ref: DO147-15

May 26, 2015

Docket Coordinator, Headquarters  
U.S. Environmental Protection Agency  
CERCLA Docket Office  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

RE: DOCKET # EPA-HQ-SFUND-2015-139; COLUMBIA FALLS ALUMINUM COMPANY  
REDUCTION PLANT PROPOSED NPL LISTING

Dear Docket Coordinator:

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on Environmental Protection Agency's (EPA) proposed National Priority Listing (NPL) for the Columbia Falls Aluminum Company (CFAC) aluminum smelter and surrounding lands that may have been impacted by past smelting emissions and associated activities. As the agency responsible for managing the state's fish and wildlife resources, FWP has a strong interest in the timely and thorough remediation of this aluminum smelter and any adjacent or affected lands and waters that are contaminated.

There is ample evidence in the required EPA emission reports, that fluoride and many other contaminants have been emitted from the smelter over many years. In addition, the results of the CFAC site assessment clearly identify the threat of contamination to both ground and surface waters, and sediments of the Flathead River and Cedar Creek. The hazardous substances that have been detected and connected with ground and surface waters include: arsenic, cadmium, chromium, cyanide, manganese, zinc, fluoride, selenium, and PCBs (Aroclor 1254). All of these contaminants have been proven to be highly toxic to fish and aquatic organisms.

The Flathead River and Cedar Creek support robust fish populations, including the federally threatened bull trout and a state species of concern, the westslope cutthroat trout. FWP's goal for both of these species is to restore and maintain strong populations of these native fish in the Flathead River system. Fish in these waters also provide angling opportunities and some fish are harvested for consumption. Though the effects of the contaminants listed above are unknown for local aquatic health and the threats to human health, peer-reviewed literature and previous sampling in Montana demonstrate these contaminants are likely to have lethal and sub-lethal

effects. These could impact respiration, liver function, and metabolism in fish, in turn causing reductions in growth and survival. The contaminants present may also have serious human health implications for those consuming fish from these waters.

In addition to aquatic communities, the CFAC and adjacent foothill, river bottom, and mountainous lands support an incredible diversity and abundance of wildlife. This is in part due to the nexus of two large mountain ranges, the confluence of the three forks of the Flathead River, and the diversity of habitat in this particular area. These CFAC and nearby public and private lands provide food and cover for hundreds of elk and white-tailed deer as well as black bear, moose, grizzly bear, wolverine, bobcat, and aquatic furbearers (beaver, river otter, muskrat, and mink). These lands also support nesting bald eagles and osprey and a nearby nesting pair of peregrine falcons. The area also is used by many species of migratory songbirds, woodpeckers, waterfowl, and game birds. It is currently unknown if CFAC contaminants are found in wildlife species or if they present a health risk to wildlife populations or to people who consume harvested wildlife.

FWP recommends that the EPA's assessment identifies the impacts of consumption or use of wildlife from CFAC property and surrounding lands on human health. Public hunting occurs in and around the CFAC site and hunters routinely harvest deer and elk in the area. We recommend that the EPA conduct an evaluation of the contaminants produced by the CFAC, contaminant ability accumulate in terrestrial wildlife species, and the impacts these contaminants may have on wildlife and human health. If the contaminants pose a risk to wildlife or human health, we recommend that deer and elk be tested to insure they are safe for human consumption and that the deer and elk populations are not adversely impacted from contaminant exposure.

As part of the ultimate goal to assess and remediate hazardous materials and contaminants associated with aluminum smelter activities, FWP urges the responsible parties and regulators to assess the level of contaminants from past activities that still may be found on or within the vegetation and soils of the CFAC property and other nearby private and public lands. The sampling for such contaminants should be relatively widespread and beyond CFAC ownership boundaries, as wildlife moves to and from this area on a seasonal basis. We expect the sampling protocol would be based on wind models, knowledge of aluminum smelting processes and emissions, and the life history and physiology of fish and wildlife species. FWP supports the sampling of both fish and wildlife species.

FWP encourages the EPA to thoroughly evaluate the site to identify all sources of contamination that may need to be addressed. The resident fish populations and aquatic community in the Flathead River and Cedar Creek have never been evaluated for the presence and concentrations of the contaminants present on the CFAC site. FWP recommends conducting an investigation to determine the geographic scope of the problem, especially the downstream extent of contamination. FWP will support ongoing data collection efforts and is willing to assist with future planning and collection of biological samples.

FWP will support a remediation process that results in the following:

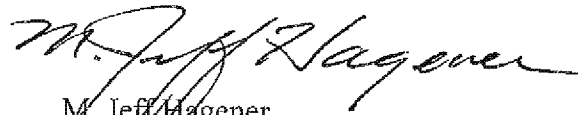
- Assessment and remediation of contamination on CFAC land and other affected properties so they can be used safely by the public

- Removal of any risk to fish and wildlife and/or public health
- Maintenance of recreational opportunities on both private and public lands into the future

To this end, FWP can offer assistance in the design and implementation of environmental assessments, as well as fish, wildlife, and health assessments. To help with a timely and efficient remediation process, we would like the opportunity to participate in advisory panels, technical committees, and any other community outreach efforts as they develop.

As always, FWP appreciates the opportunity to provide comments. Please contact Jim Williams, the FWP Region 1 Supervisor, at (406) 751-4566 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Jeff Hagener". The signature is fluid and cursive, with the first name "M." and last name "Hagener" clearly distinguishable.

M. Jeff Hagener  
Director

c: Jim Williams, FWP Region 1